1	JESSE S. KAPLAN CSB#103726		
2	5441 Fair Oaks Bl. Ste. C-1 Carmichael, CA 95608		
3	916/488-3030		
4	916/489-9297 fax		
5	Attorney for Plaintiff SHAUNA DECKER for M.D.D.		
6			
7 8	UNITED STATE	S DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA		
10	-o0O0o-		
11			
12	S. DECKER o/b/o M.D.D.,	No. 2:23-CV-00009-AC	
13	Plaintiff,		
14		STIPULATION AND [proposed] ORDER FOR EXTENSION OF	
15		TIME TO FILE PLAINTIFF'S MOTION FOR	
16	v.	SUMMARY JUDGMENT	
17 18	Kilolo Kijakazi, ACTING COMMISSIONER OF SOCIAL SECURIT	Υ,	
19	Defendant.		
20		/	
21	IT IS HEREBY STIPULATED by a	and between the parties, through their respective	
22	undersigned attorneys, and with the permissio	n of the Court, that plaintiff's time to file a motion	
24	for summary judgment is extended to June 2, 2	2023.	
25	This is a second extension. The first	extension was to May 24, 2023. This extension is	
26	requested because plaintiff's counsel mistake	enly believed the May 24 due-date pertained to a	
27			
28			
	1.1		

1	different case, is involved in working on that brief, and was also delayed by two days in doing	
2	so, thus will not begin this brief until later than that date.	
3		
4	Dated: May 22, 2023 /s/ Jesse S. Kaplan	
5	JESSE S. KAPLAN Attorney for Plaintiff	
6	Attorney for Flamitin	
7		
8	Dated: May 22, 2023 /s/ per e-mail authorization	
9	OSCAR GONZALES DeLLANO	
10	Special Assistant U.S. Attorney Attorney for Defendant	
11		
13		
14	<u>ORDER</u>	
15	For good cause shown on the basis of this stipulation, the requested extension of	
16	plaintiff's time to file a motion for summary judgment is extended to June 2, 2023. Defendant's	
17	time to file a cross-motion is extended accordingly.	
18	SO ORDERED.	
19		
20	Dated: May 23, 2023	
21	ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE	
22		
23		
24		
25		
26		
27		
28		